

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHRYN LISTER, an individual,

Plaintiff

v.

HYATT CORPORATION, a Delaware
corporation d/b/a HYATT REGENCY
BELLEVUE,

Defendants.

NO.

NOTICE OF REMOVAL

JURY DEMAND

TO: The United States District Court for the Western District of Washington at Seattle;

Defendant HYATT CORPORATION d/b/a HYATT REGENCY BELLEVUE ("Hyatt Corporation"), by and through counsel, hereby gives notice that it is removing this case to the United States District Court for the Western District of Washington at Seattle on the grounds set forth below:

1. On or about May 31, 2018, Plaintiff filed her Summons and Complaint in King

NOTICE OF REMOVAL - 1

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1 County Superior Court in the State of Washington.

2 2. On or about June 8, 2018, Plaintiff served Defendant Hyatt Corporation with the
3 Summons and Complaint.

4 3. Defendant Hyatt Corporation is a Delaware corporation, with its principal place of
5 business in Illinois.

6 4. This Notice is being filed within 30 days of suit being filed in the King County
7 Superior Court and of service of the Summons and Complaint upon Defendant.

8 5. 28 U.S.C. § 1441(a) provides in part as follows:

9 Except as otherwise expressly provided by Act of Congress, any civil
10 action brought in a State court of which the district courts of the United
11 States have original jurisdiction, may be removed by the defendant or
12 the defendants, to the district court of the United States for the district
and division embracing the place where such action is pending. For
purposes of removal under this chapter, the citizenship of defendants
sued under fictitious names shall be disregarded.

13 6. According to her Complaint, Plaintiff is seeking damages for personal injuries
14 allegedly sustained in King County, Washington. Based upon undersigned counsel's experience and
15 the allegations of the Complaint, plaintiff is expected to seek special and general damages in excess
16 of \$75,000.

17 7. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §1441(a) by
18 virtue of 28 U.S.C. §1332(a)(1). Removal is proper to the United States District Court for the Western
19 District of Washington at Seattle because that district and division embrace King County.

20 8. True and correct copies of the pleadings filed in King County Superior Court under
21 Cause No. 18-2-13834-5 SEA are attached hereto as follows:

22 Exhibit A. Summons filed May 31, 2018;

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1 Exhibit B. Complaint for Damages filed May 31, 2018;

2 Exhibit C. Order Setting Civil Case Schedule filed May 31, 2018;

3 Exhibit D. Declaration of Service filed June 12, 2018;

4 Exhibit E. Notice of Appearance filed June 20, 2018;

5 Exhibits A through E constitute the complete record of all proceedings in the state court.

6 WHEREFORE, Defendant Hyatt Corporation gives notice that the court action pending
7 against them in King County Superior Court has been removed from that court to the United States
8 District Court for the Western District of Washington at Seattle.

9 DATED this 28th day of June, 2018.

10 ANDREWS ▪ SKINNER, P.S.

11 By s/Kristen Dorrity

12 KRISTEN DORRITY, WSBA #23674
13 645 Elliott Ave. W., Suite 350, Seattle, WA 98119
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14 Email: Kristen.dorrity@andrews-skinner.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record. A copy will also be sent via email and US Mail to plaintiff's attorney listed below:

Attorneys for plaintiff:

Rebecca Graham
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Issaquah, WA 98027
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ANDREWS ▪ SKINNER, P.S.

By s/Kristen Dorrity

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